



CENTRAL LIBRARY

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7/3/2014

Dear Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai, and O'Reilly:

On behalf of Boston Public Library (BPL), the Metro Boston Library network for which we are the lead agency and, as an active member of The Urban Library Council and the American Library Association, we would like to commend the Commission's recent focus on eRate modernization and related rules review.

The BPL has participated in this program since its inception. While appreciative of funding received over the years, we also recognize that specific decreases in available funding, coupled with increasing demand, prevents us from maintaining the appropriate technology to support our access and education goals.

We are especially encouraged by the renewed focus on "internal connections" to deliver the supporting infrastructure to provide better WIFI access to all users and visitors in such a way as to allow us and our peers to meet current demand as well as plan for the demands of tomorrow, and to do so on an ongoing basis, (in 5 year increments, as currently proposed). These technology services are now a core part of our mission; serving those without access through other means, those who are job hunting, wanting to start a small business, attempting to access other governmental or civic services, to improve themselves, or simply to meet their leaning goals across all ages and situations.

We support the idea of ensuring that a guaranteed amount of funding within the program be available for library applications to fund these services. The use of a metric such as "population served," or a hold-back based upon the percentage of library buildings within the overall USAC SLD entity list, is viewed as a preferred mechanism to maintain equality in the program across the school and library cohorts, as both play different but critical and complimentary roles in the overall education goals serving as the basis of this reform.

We understand, however, that recent rule revision proposals are focused on a *cost per square foot* allocation for libraries, with essentially a minimum floor and a new (doubled) minimum match requirement. The most problematic aspect of this metric choice is that without correct, complete and actual cost per square foot amounts (or a an allowable *range*) systems with additional complexity due to any of the following a) density of building and wall construction or of stack systems in buildings; b) the

historic nature of the buildings and the consequent limits on building modifications; c) geographic complexity which varies among both urban and rural contexts, but is equally challenging; d) expectations by patrons that wifi-enabled services and library programs be available in adjacent and exterior spaces, will be at a disadvantage. We understand an exception to the proposed rule specifically addresses challenges in Alaska. A further modification to proposed rules that would accommodate the listed areas of concern and yield a cost per square footage that would achieve program goals should be considered in addition to a raise in the proposed cost per square foot amount.

In short, a simple \$1 per square foot allowance is insufficient for at least many, if not most, urban libraries. When combined with a maximum 80% match, it places a financial burden on libraries that would prevent the program from meeting its goals.

The Commission should not adopt a measure that locks libraries into outdated costs or technology that addresses only minimum service levels of WIFI capacity deployment. The majority of libraries need to dramatically upgrade their internal networks to scale for the gigabit goals we all support – a strong network or WIFI deployment is only as good as the total capacity of the underlying infrastructure and each component thereof.

Managing costs and preventing waste remain laudable program goals and with these measures in place, entities that can achieve their goals with lower allowable funding levels should still be permitted and encouraged to do so. Localized competitive bidding mechanisms are part of this strategy and, to the extent the new rules make the *application, sourcing and review* processes simpler, faster, more transparent and thus potentially even more competitive, these results will be further improved, ultimately delivering greater aggregate capacity nationally.

Thus, if the Commission is committed to a cost per square foot model, we propose that a reasonable formula must accommodate substantiated costs *up to* \$4 per square foot with a funding floor for libraries whose square footage is 8000 square feet or less. Libraries at the floor would thus be eligible for \$8000.

We look forward to the Commission's rules proposal in this area, and further dialogue on this and subsequent reforms for areas not yet under formal consideration

Sincerely,

A handwritten signature in black ink, appearing to read 'David Leonard', with a stylized, cursive script.

David Leonard

Director of Administration/Chief Technology Officer